

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

IN RE:	)	
	)	
THOMAS DALE GODBOLD, JR.	)	CASE NO.: 23-11384-LRC
AND MELANIE BLAISDELL GODBOLD	)	
	)	CHAPTER 13
DEBTORS.	)	
-----	)	JUDGE LISA RITCHEY CRAIG
	)	
MELISSA J. DAVEY,	)	
STANDING CHAPTER 13 TRUSTEE,	)	
Movant,	)	
	)	
v.	)	CONTESTED MATTER
	)	
THOMAS DALE GODBOLD, JR.	)	
AND MELANIE BLAISDELL GODBOLD	)	
Respondents.	)	
-----	)	

**CHAPTER 13 TRUSTEE'S  
SUPPLEMENTAL OBJECTION TO CONFIRMATION & MOTION TO DISMISS**

Melissa J. Davey, Chapter 13 Trustee, objects to confirmation of the plan and moves to dismiss this case pursuant to 11 U.S.C. Section 1307(c) for the following reasons:

1. The Amended Chapter 13 Plan is ineffective and cannot be administered by the Chapter 13 Trustee because it fails to correctly identify the amended Plan sections (1.1, 1.3, 3.2 & 8.1) as required by NDGA Bankruptcy Court General Order 21-2017 and/or 41-2020.
2. The Chapter 13 Plan fails to provide treatment of the filed secured arrears claim of Lakeview Loan Servicing in violation of 11 U.S.C. Sections 1322(a)(2) or 1325(a)(5).
3. The Chapter 13 Plan provides for treatment of the secured/priority claim of USAA Credit Card Payments, but said creditor filed an unsecured proof of claim. The plan should be amended accordingly.

Wherefore, the Trustee moves this Honorable Court to consider the above objections at the confirmation hearing, deny confirmation of the Chapter 13 plan, dismiss the case pursuant to 11 U.S.C. Section 1307(c), and for such other and further relief that this Court deems just and proper.

Dated: March 18, 2024

/s/Kelsey A. Makeever

Kelsey A. Makeever

Attorney for the Chapter 13 Trustee

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IN RE:	)	CASE NO.: 23-11384-LRC
	)	
THOMAS DALE GODBOLD, JR.	)	CHAPTER 13
AND MELANIE BLAISDELL GODBOLD	)	
	)	JUDGE LISA RITCHEY CRAIG
DEBTORS.	)	
	)	

**CERTIFICATE OF SERVICE**

This is to certify that I have on this day electronically filed the foregoing Chapter 13 Trustee's Supplemental Objection to Confirmation & Motion to Dismiss using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

**Attorney for the Debtor(s):**  
JOHN DUFOUR ATTORNEY AT LAW

I further certify that on this day I caused a copy of this document to be served via first class mail, with adequate postage prepaid on the following parties set forth below at the address shown for each.

DEBTORS:

THOMAS DALE GODBOLD, JR.  
85 CAMP LN  
CARROLLTON, GA 30117

MELANIE BLAISDELL GODBOLD  
85 CAMP LN  
CARROLLTON, GA 30117

Dated: March 18, 2024

/s/Kelsey A. Makeever  
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